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JORDAN ZEICHNER, on Behalf of Himself and  
All Others Similarly Situated*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

JORDAN ZEICHNER, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

NORDSEC LTD., NORDSEC B.V., NORDVPN  
S.A., NORD SECURITY INC., and TEFINCOM  
S.A. d/b/a NordVPN,

Defendants.

Case No.: 3:24-cv-2462-JSC

**STIPULATION AND ~~[PROPOSED]~~  
ORDER] EXTENDING PLAINTIFF  
JORDAN ZEICHNER'S TIME TO  
RESPOND TO DEFENDANTS'  
MOTION TO DISMISS OR STAY  
PLAINTIFF'S AMENDED  
COMPLAINT AND DEFENDANTS'  
TIME TO REPLY UNDER CIVIL  
LOCAL RULE 6; AND RELIEF FROM  
THE CASE MANAGEMENT  
SCHEDULE UNDER CIVIL LOCAL  
RULE 16-2**

Pursuant to Civil Local Rule 6 and 16-2, Plaintiff Jordan Zeichner (“Plaintiff”) and Defendants NordSec LTD., NordSec B.V., NordVPN S.A., Nord Security Inc., and Tefincom S.A. d/b/a NordVPN (together, “Defendants”)<sup>1</sup> (Plaintiff and Defendants collectively, the “Parties”) hereby stipulate as follows:

1. Plaintiff filed the class action complaint in this action on April 26, 2024. Dkt. 1.

2. On June 26, 2024, the Court granted the Parties’ stipulation to extend Defendant Nord Security Inc.’s deadline to respond to the complaint to August 1, 2024. Dkt. 29. The Court also continued the deadline for the parties to submit a joint case management statement to August 15, 2024, and continued the date for the initial case management conference to August 22, 2024. Dkt. 30.

3. On August 1, 2024, Defendants filed a Motion To Dismiss Or Stay Under The “First-to-File” Rule, Or In The Alternative To Dismiss Under Fed. R. Civ. P. 12(b)(6); And Motion To Dismiss Under Fed. R. Civ. P. 12(b)(2). Dkt. 39.

4. On August 15, 2024, the Court granted the parties’ stipulation to vacate the briefing schedule for Defendants’ pending motion to dismiss or stay, suspend the deadline for the Parties to submit a case management statement, and reschedule the case management conference until after Plaintiff filed his amended complaint and Defendants had an opportunity to respond. Dkt. 41.

5. On August 22, 2024, Plaintiff filed the first amended class action complaint in this action. Dkt. 42. On the same day, the Court issued a notice resetting the initial case management conference for October 17, 2024, and the deadline to submit a joint case management statement to October 10, 2024. Dkt. 43.

6. On September 5, 2024, Defendants filed a Motion To Dismiss Or Stay Plaintiff’s Amended Complaint Under The “First-to-File” Rule, Or In The Alternative To Dismiss Under Fed.

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<sup>1</sup> As stated in Defendants’ motion to dismiss or stay Plaintiff’s amended complaint (Dkt. 44), Defendants Nord Security Inc., NordSec B.V., and NordSec Ltd deny that this court has jurisdiction over them, and they appear solely for purposes of this stipulation for an extension and relief from the case management schedule.

1 R. Civ. P. 12(b)(6); And Motion To Dismiss Under Fed. R. Civ. P. 12(b)(2) (the “Motion”). Dkt.  
2 44.

3 7. On September 6, 2024, the Court continued the hearing date for the Motion to  
4 October 30, 2024. Dkt. 45.

5 8. Plaintiff’s response in opposition to the Motion is currently due on or before  
6 September 19, 2024.

7 9. The Parties stipulate to extending the deadline for Plaintiff to file his response to the  
8 Motion by 21 days from September 19, 2024 to October 10, 2024.

9 10. The Parties further stipulate to extending the deadline for Defendants to file their  
10 reply in support of the Motion by 11 days from October 17, 2024 to October 28, 2024.

11 11. Under this schedule, briefing on the Motion will not be complete until after October  
12 17, 2024, the current scheduled date for the initial case management conference, and only two days  
13 before October 30, 2024, the current scheduled date for the Motion hearing.

14 Accordingly, the Parties agree to extend Plaintiff’s deadline to respond to the Motion to  
15 October 10, 2024, and agree to extend Defendants’ deadline to file a reply in support of the Motion  
16 to October 28, 2024. The Parties also jointly request that the Court continue the initial case  
17 management conference and associated deadlines, as well as the Motion hearing, to a date after  
18 October 30, 2024 that is convenient for the Court. Other than modifying the case management  
19 conference date and associated deadlines, and the hearing date for the Motion, this requested time  
20 modification will not affect the schedule for the case.

21 **IT IS SO STIPULATED.**

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27 ~~STIPULATION AND PROPOSED~~ ORDER EXTENDING PLAINTIFF JORDAN  
28 PLAINTIFF’S AMENDED COMPLAINT AND DEFENDANTS’ TIME TO REPLY UNDER  
CIVIL LOCAL RULE 6; AND RELIEF FROM THE CASE MANAGEMENT SCHEDULE  
UNDER CIVIL LOCAL RULE 16-2

CASE NO.: 3:24-cv-2462-JSC

1 Dated: September 17, 2024

MILLBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC NC

2  
3 By: /s/ Scott C. Harris

4 Scott C. Harris

Jessica Hunter

5 ***Attorneys for Plaintiff***  
6 ***Jordan Zeichner***

7 Dated: September 17, 2024

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8  
9 By: /s/ Jedediah Wakefield

10 Jedediah Wakefield

11 Adam Gahtan (*admitted pro hac vice*)

Ethan Thomas

Samuel Sahagian

12 ***Attorneys for Defendants***  
13 ***NORDSEC LTD., NORDSEC B.V.,***  
14 ***NORDVPN S.A., NORD SECURITY INC.,***  
***and TEFINCOM S.A. d/b/a NordVPN***


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CASE NO.: 3:24-cv-2462-JSC

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 17, 2024

  
Hon. Jacqueline Scott Corley  
United States District Court Judge

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING PLAINTIFF JORDAN  
ZEICHNER'S TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS OR STAY  
PLAINTIFF'S AMENDED COMPLAINT AND DEFENDANTS' TIME TO REPLY UNDER  
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